

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:18-cv-01091-KBJ**

JAMES MADISON PROJECT et al v. DEPARTMENT OF  
DEFENSE

Assigned to: Judge Ketanji Brown Jackson

Cause: 05:552 Freedom of Information Act

Date Filed: 05/09/2018

Jury Demand: None

Nature of Suit: 895 Freedom of  
Information Act

Jurisdiction: U.S. Government Defendant

**Plaintiff**

**JAMES MADISON PROJECT**

represented by **Mark Steven Zaid**  
LAW OFFICES OF MARK S. ZAID, P.C.  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036  
(202) 454-2809  
Fax: (202) 330-5610  
Email: [Mark@MarkZaid.com](mailto:Mark@MarkZaid.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Bradley Prescott Moss**  
LAW OFFICES OF MARK S. ZAID, P.C.  
1250 Connecticut Avenue, NW  
Suite 700  
Washington, DC 20036  
(202) 454-2809  
Fax: (202) 330-5610  
Email: [brad@markzaid.com](mailto:brad@markzaid.com)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**BRIAN J. KAREM**

represented by **Mark Steven Zaid**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Bradley Prescott Moss**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**DEPARTMENT OF DEFENSE**

represented by **April Denise Seabrook**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW  
Washington, DC 20530  
(202) 252-2525  
Fax: (202) 252-2599  
Email: [april.seabrook@usdoj.gov](mailto:april.seabrook@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Kenneth A. Adebonojo**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW

Washington, DC 20530  
 (202) 252-2562  
 Fax: (202) 252-2599  
 Email: [kenneth.adebonojo@usdoj.gov](mailto:kenneth.adebonojo@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
05/09/2018	<u>1</u>	COMPLAINT against DEPARTMENT OF DEFENSE ( Filing fee \$ 400 receipt number 0090-5471601) filed by THE JAMES MADISON PROJECT, BRIAN J KAREM. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit Rule 7.1 certification, # <u>3</u> Summons DoD, # <u>4</u> Summons USADC, # <u>5</u> Summons USAG)(Moss, Bradley) (Entered: 05/09/2018)
05/09/2018		Case Assigned to Judge Ketanji Brown Jackson. (zsth) (Entered: 05/09/2018)
05/09/2018	<u>2</u>	LCvR 7.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by JAMES MADISON PROJECT (zsth) (Entered: 05/09/2018)
05/09/2018	<u>3</u>	SUMMONS (3) Issued Electronically as to DEPARTMENT OF DEFENSE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zsth) (Entered: 05/09/2018)
05/10/2018	<u>4</u>	GENERAL ORDER AND GUIDELINES FOR CIVIL CASES BEFORE JUDGE KETANJI BROWN JACKSON. The Court will hold the parties and counsel responsible for following these directives, and parties and counsel should pay particular attention to the Courts instructions for briefing motions and filing exhibits. Failure to adhere to this Order may, when appropriate, result the imposition of sanctions and/or sua sponte denial of non-conforming motions. Signed by Judge Ketanji Brown Jackson on 5/10/2018. (lckbj1) (Entered: 05/10/2018)
05/15/2018	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 5-15-18. (Attachments: # <u>1</u> Exhibit USAG receipt)(Moss, Bradley) (Entered: 05/15/2018)
05/15/2018	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 5/15/2018. Answer due for ALL FEDERAL DEFENDANTS by 6/14/2018. (Attachments: # <u>1</u> Exhibit USADC receipt)(Moss, Bradley) (Entered: 05/15/2018)
06/04/2018	<u>7</u>	MOTION for Leave to File <i>First Amended Complaint</i> by JAMES MADISON PROJECT, BRIAN J. KAREM (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Exhibit 1 - First Amended Complaint, # <u>3</u> Text of Proposed Order)(Moss, Bradley) (Entered: 06/04/2018)
06/05/2018		MINUTE ORDER granting <u>7</u> Motion for Leave to File Amended Complaint. Counsel is reminded the review this Court's <u>4</u> General Order and Guidelines and comply with its requirements when filing motions, including Para. 3(b) of the Appendix thereto regarding filing amended pleadings. Signed by Judge Ketanji Brown Jackson on 06/05/2018. (lckbj1) (Entered: 06/05/2018)
06/05/2018	<u>8</u>	AMENDED COMPLAINT against DEPARTMENT OF DEFENSE filed by JAMES MADISON PROJECT, BRIAN J. KAREM.(jf) (Entered: 06/06/2018)
06/13/2018	<u>9</u>	NOTICE of Appearance by April Denise Seabrook on behalf of All Defendants (Seabrook, April) (Entered: 06/13/2018)
06/13/2018	<u>10</u>	MOTION for Extension of Time to File Answer re <u>8</u> Amended Complaint by DEPARTMENT OF DEFENSE (Attachments: # <u>1</u> Text of Proposed Order)(Seabrook, April) (Entered: 06/13/2018)
06/18/2018		MINUTE ORDER granting, for good cause shown, <u>10</u> Motion for Extension of Time to Answer. It is hereby ORDERED that Defendant shall answer or otherwise respond to the complaint on or before 7/17/2018. Signed by Judge Ketanji Brown Jackson on 06/18/2018. (lckbj1) (Entered: 06/18/2018)

06/28/2018	<u>11</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 06/28/2018)
07/16/2018	<u>12</u>	ANSWER to <u>8</u> Amended Complaint by DEPARTMENT OF DEFENSE.(Seabrook, April) (Entered: 07/16/2018)
09/27/2018	<u>13</u>	SUPERSEDING GENERAL ORDER AND GUIDELINES FOR FOIA CASES ASSIGNED TO JUDGE KETANJI BROWN JACKSON. This Order supersedes this Court's prior <u>4</u> General Order and Guidelines for Civil Cases. The Court will hold the parties and counsel responsible for following these amended directives, and parties and counsel should pay particular attention to the Court's instructions for processing and production of records, batching motions, and filing exhibits. Failure to adhere to this Order may, when appropriate, result the imposition of sanctions and/or sua sponte denial of non-conforming motions. Signed by Judge Ketanji Brown Jackson on 9/27/2018. (lckbj1) (Entered: 09/27/2018)
09/27/2018		MINUTE ORDER. Before the Court in this FOIA case are a complaint and an answer. It is hereby ORDERED that the parties shall review this Court's <u>13</u> General Order and Guidelines Applicable to FOIA Cases, and promptly confer and file a joint proposed schedule for disclosure or briefing motions for summary judgment, on or before 10/11/2018. Signed by Judge Ketanji Brown Jackson on 09/27/2018. (lckbj1) (Entered: 09/27/2018)
10/11/2018	<u>14</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE. (Seabrook, April) (Entered: 10/11/2018)
10/15/2018		MINUTE ORDER. In light of the representations in the parties' <u>14</u> Joint Status Report, it is hereby ORDERED that the parties shall file a further joint status report on or before 12/19/2018, which shall include a proposed schedule for further proceedings if litigation is going to be necessary. Signed by Judge Ketanji Brown Jackson on 10/15/2018. (lckbj1) (Entered: 10/15/2018)
01/29/2019	<u>15</u>	Consent MOTION for Extension of Time to <i>File the Parties' Joint Status Report</i> by DEPARTMENT OF DEFENSE (Adebonojo, Kenneth) (Entered: 01/29/2019)
02/05/2019		MINUTE ORDER granting, for good cause shown, <u>15</u> Consent Motion for Extension of Time to File Status Report, nunc pro tunc. It is hereby ORDERED that, on or before 2/28/2019, the parties shall file a joint status report, which shall contain a proposed schedule for further proceedings if litigation is going to be necessary. Signed by Judge Ketanji Brown Jackson on 2/5/2019. (lckbj1) (Entered: 02/05/2019)
02/28/2019	<u>16</u>	Consent MOTION for Extension of Time to <i>File A Joint Status Report</i> by DEPARTMENT OF DEFENSE (Adebonojo, Kenneth) (Entered: 02/28/2019)
02/28/2019		MINUTE ORDER granting, for good cause shown <u>16</u> Motion for Extension of Time to File Joint Status Report. It is hereby ORDERED that the parties' joint status report is due on or before 3/8/2019. Any further requests for extensions of time must comply with <u>4</u> the Court's General Order and Guidelines for Civil Cases. Counsel is specifically directed to Section 5 of the Appendix to the General Order and Guidelines. Signed by Judge Ketanji Brown Jackson on 2/28/2019. (lckbj1) (Entered: 02/28/2019)
03/08/2019	<u>17</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE. (Seabrook, April) (Entered: 03/08/2019)
03/12/2019		MINUTE ORDER. In light of the representations in the parties' <u>17</u> Joint Status Report, it is hereby ORDERED that the parties shall file a further joint status report on or before 4/12/2019, which shall include a proposed schedule for further proceedings if litigation is going to be necessary. Signed by Judge Ketanji Brown Jackson on 3/12/2019. (lckbj1) (Entered: 03/12/2019)
04/24/2019	<u>18</u>	Joint STATUS REPORT by JAMES MADISON PROJECT, BRIAN J. KAREM. (Attachments: # <u>1</u> Text of Proposed Order)(Moss, Bradley) (Entered: 04/24/2019)
04/26/2019		MINUTE ORDER. In light of the representations in the parties' <u>18</u> Joint Status Report, it is hereby ORDERED that the parties shall file a further joint status report on or before 5/28/2019, which shall include a proposed schedule for further proceedings if litigation is going to be necessary. Signed by Judge Ketanji Brown Jackson on 4/26/2019. (lckbj1) (Entered: 04/26/2019)

05/29/2019	<u>19</u>	Joint STATUS REPORT <i>and Proposed Schedule</i> by DEPARTMENT OF DEFENSE. (Seabrook, April) (Entered: 05/29/2019)
05/30/2019		MINUTE ORDER. In light of the representations in the parties' <u>19</u> Joint Status Report, it is hereby ORDERED that, on or before 7/8/2019, the parties shall file a further joint status report, which shall include a proposed schedule for further proceedings if litigation is going to be necessary. Signed by Judge Ketanji Brown Jackson on 5/30/2019. (lckbj1) (Entered: 05/30/2019)
07/08/2019	<u>20</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE. (Seabrook, April) (Entered: 07/08/2019)
07/12/2019		MINUTE ORDER. In light of the representations in the parties' <u>20</u> Joint Status Report, it is hereby ORDERED that, on or before 8/9/2019, the parties shall file a further joint status report, which shall include a proposed schedule for further proceedings if litigation is going to be necessary. Signed by Judge Ketanji Brown Jackson on 7/12/2019. (lckbj1) (Entered: 07/12/2019)
09/09/2019		MINUTE ORDER. On July 12, 2019, this Court entered a Minute Order setting a deadline of August 8, 2019 for the parties to file a joint status report. That deadline having passed without receipt of a joint status report, it is hereby ORDERED that, on or before September 16, 2019, the parties shall file a further joint status report, which shall include a proposed schedule for further proceedings if litigation is going to be necessary. Signed by Judge Ketanji Brown Jackson on 09/09/2019. (lckbj3, ) (Entered: 09/09/2019)